



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

April 5, 2007

Mr. Michael A. Caldwell
U.S. Department of the Interior
National Park Service
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406-1009

Re: Valley Forge National Historical Park Draft General Management Plan/Environmental Impact Statement (CEQ #20070052)

Dear Mr. Caldwell:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan/Environmental Impact Statement for Valley Forge National Historical Park. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information.

Surface Waters and Groundwater

As stated on page 3-34, "A total of 34.32 miles of the Schuylkill have been defined as impaired by the DEP, including the three miles of river flow through the park. The listing is due to PCB and chlordane contamination from outside the park." Page 3-35 makes note that Valley Creek is a "...is 303(d) listed by the commonwealth because of PCB contamination, turbidity, sedimentation, nutrients, and flow alteration." Thus, it was determined in the DEIS that the establishment of new pedestrian/bicycle bridges over the Schuylkill River and Valley Creek would result in some soil disturbance at the landings and piers (page 4-32/4-34). As a result, "The construction would disrupt the river bottom, potentially introducing a high level of sedimentation and disruption to river hydrology." (Page 4-38).

EPA would like the FEIS to assess the impacts to these waters and sediments related to the two proposed bridges; including the upgrade and widening of the existing US 422 bridge since the Betzwood Bridge replacement and the widening of US 422 bridge cross the Schuylkill River and its associated floodplain. (Page 4-41). In addition, the FEIS should discuss fish, herpetological, and mammal passages, where appropriate. Any crossings of streams,



wetlands, etc. should also consider oversized natural bottom culverts to minimize impacts and discuss if the crossings can be spanned without piers. Mitigation for impacts should also be discussed in the FEIS.

The National Park Service should use the new PADEP stormwater manual and/or indicate its use in the FEIS.

Floodplains

Page 4-41 states that, “The increase in impervious surface associated with the widening of the turnpike would have long-term, major, adverse impacts to the floodplains of Valley Creek and its tributaries and to that of Trout Run, if a maximal use of best management practices for stormwater management is not considered, including measures to infiltrate stormwater and slow its rate to prevent scouring.” The DEIS also states, “The current proposal for the PA Route 29/PA Turnpike slip ramp calls for dumping of all stormwater into the Warner Quarry, from which water is pumped into a tributary of Cedar Creek. No infiltration or control of volume is proposed. This proposal, if implemented, would have long-term, major, adverse impacts to the floodplain of Valley Creek.” The National Park Service should indicate in the FEIS whether the new PADEP stormwater manual has been used.

As noted on page 4-42, “Several failing dams within the park would also be removed.” It is also stated, that “By eliminating these additional man-made structures from within the floodplain, natural hydrologic flows should return and sedimentation build up would be minimized, a long-term, moderate, beneficial impact.” The DEIS did not specify the locations of the dams to be removed, namely Valley Creek, Meyer’s Run, Colonial Springs, and Fatlands dams (Page 4-38). Additionally, the FEIS should address the potential impact that this action may have on water quality and the potential to disrupt contaminated soils within the stream that may result from a change in hydrologic flow, particularly within Valley Creek.

Wetlands

The wetlands discussed in Section 3.4.7 should be quantified and labeled on a map as Figure 3-4 does not adequately support the text. For example, page 3-39, states that, “The largest wetland in Valley Forge is located within the floodplain on the south bank of the Schuylkill River, between the railroad tracks and the river.” Figure 3-4 should clearly depict/label the exact location of this wetland (and others referenced in Section 3.4.7). In addition, the landmarks mentioned in the text to pinpoint wetlands locations should also be indicated on the map (i.e. railroad tracks, Port Kennedy Train Station, Maurice Stephens House, General Varnum’s Quarters, Mount Misery, Lord Stirling’s Quarters, Fatland Island, etc.

Page 4-45, “All the action alternatives propose construction of pedestrian/bicycle crossings of the Schuylkill River and Valley Creek.” “Depending on the north side location for the Schuylkill River crossing, there could be a long-term, minor, adverse impact from a new bridge pier.” What would be the approximate area of wetlands impact and what kinds of wetlands have the potential to be impacted? In addition, the small wetland within the Grand Parade should be delineated and size indicated.



Vegetation


As stated on page 4-50, "Rehabilitation of the interpretive focus areas and re-establishment of some vistas would result in the removal/modification of approximately 20 acres of vegetation, a long-term, moderate, adverse impact. However, approximately 15 acres of this vegetative cover would remain, converting from forest to meadow habitat, a long-term, moderate, beneficial impact." The FEIS should specify where the forest removal will take place indicating the age and type of trees removed as well as noting any impact to encampment-period trees, state champion and/or historic trees? In addition to providing the present composition of the area, the FEIS should discuss if habitat loss has been accounted for with particular attention to impacts on sensitive species.

Miscellaneous

Table 2-5, Summary of Environmental Consequences, would be more useful if it quantified (where possible) the environmental impacts described in Chapter 4: Environmental Consequences.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



William Arguto
NEPA Team Leader

Enclosure

